

AMROBA[®]inc

ADVOCATE OF THE AVIATION MRO INDUSTRY

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Managing Change—LAME

Volume 8, Issue 2

The success of managing change is to ensure that those affected understand it and that they will be able to cope effectively with it. Change is unsettling so those managing change need to be a settling influence. Those affected by the change should have agreed to it, or at least understand the need for change, and have a chance to decide how the change will be managed. Those affected should be involved in the planning and implementation of the change. Understanding change should not be about 'training' but about learning.

Why the AME licence needed changing is no longer an issue that we can debate because CASA has made a decision that is not supported by the majority of non-airline AMOs and LAMEs. So, CASA has effected change without the majority of non-airline LAMEs understanding the change.

Can LAMEs safely transition to the new licence?

Unlike the airlines LAME who comply with large AMOs procedures, the non airline LAME has to understand and meet regulatory requirements.

So lets look at the basic international requirements for a Contracting State to issue an AME licence, its privileges and what the licence should look like.

Firstly, ICAO Annex 1, Chapter 4, para 4.2.2.3 states: *A Contracting State shall prescribe the scope of the privileges of the licence holder in terms of the complexity of the tasks to which the certification relates.*

4.2.2.3.1. Recommendation – Details of the certification privileges should be endorsed on or attached to the licence, either directly or by reference to another document issued by the Contracting State.

5.1.1.2. The following details shall appear on the licence:

XII) ratings, e.g. category, class, type of aircraft, airframe, etc.:

XIII) remarks, i.e. special endorsements relating to limitations and endorsements for privileges, \ and other information in pursuance to Article 39 of the Chicago Convention.

Note: the roman numerals used by ICAO above must be the licence item headings used by each Contracting State (Australia). Issuing the licence

CASA has arbitrarily decided on a licensing structure that is very different to what they proposed during the consultation period.

Irrespective of what licence structure is used, the LAME must be fully cognisant with the scope of the licence and its ratings as well as his/her regulatory responsibility.

The "scope" of the current licence is detailed in the CAO100.90 series. The CAO series were based on addressing many years of safety issues culminating in a real safety document. This complies with the ICAO requirements but the new requirements no longer specifies the scope of the licence and its ratings except for a broad ATA Chapter table that does not address tasks.

Any limitation on a licence should be under item XIII on the licence. In addition, where is the statement that the holder can speak English.

What is the "scope" of the new licence?

Where has CASA promulgated the "complexity of the tasks" to which the AME licence relates?

Example of the confusion of this new legislation.

MoS 66.A.20—Privileges

4. Subject to Table 1 and paragraph 66.A.45 (b), a person who holds a Category B1 licence endorsed with a subcategory may perform maintenance certification for that subcategory maintenance if:

- (i) the person carried out the subcategory maintenance; and
- (ii) the maintenance was any of the following:
 - (B) work on an aircraft system designated in Table 1, as structural, power-plant, mechanical or electrical;

66.5. electrical system means the aircraft electrical power supply source, plus the distribution system to the different components contained in the aircraft and relevant connectors. Electrical systems are specified in Table 1.

Table 1 States ATA 24 Electrical System is "electrical" so this implies that B1 licence can maintain these systems.

AMROBA will be discussing these and other issues with CASA this month.

Managing Change—cont.

As can be seen, the change associated with the AME licensing system should have been welcomed by all in the MRO industry if CASA had managed the change properly.

There is now total confusion and lack of trust of CASA and its ability to implement this massive change that was totally unexpected by the non air-line sectors who were expecting a B3 AME licence.

AMROBA has never supported the B3 concept and we can see benefits in the change IF CASA promulgates a document that will comply with global standards to prescribe the "scope" of the licence by specifying the "complexity of the tasks" and refer to that document on the AME licence.

CASA has until June to get its house in order and provide the guidance we all need to understand the future scope of the AME licence.

Our discussions with CASA is on-going and there are some promising outcomes being seen.

Let us look at other issues confronting the change process for this industry.

For example, how many CAR 30 component shops will transition into the new system and how many will opt out of the change.

Most component organisations compete in a global aviation system and have done so for many years. In fact, as each regulatory change imposes additional regulatory imposts, it has become more economical to have components maintained off-shore.

As airlines struggle to stay viable with other modes of transport, their maintenance control technical service providers will look for competitive pricing options globally. This has been the trend over the last 20/30 years.

If the EASA Part 145 system had been adopted then there is a possibility that some organisations could be more competitive globally in aircraft maintenance but the Australian Part 145 is unique with considerable micro management by CASA.

Instead of a company manual that provides guidance to the organisation's staff that will ensure good maintenance practices, much is dedicated to satisfying CASA requirements. These new rules create an enforceable system that demands a record system to assist CASA's audit program.

CASA has determined the management structure, the business operating procedures, and the approval of individuals that will hold key positions within a business. Therefore one has to question whether this regulatory change is incremental or discontinuous.

Incremental change is often referred to as continuous improvement by focusing on change, adaption and modification to do things better.

Discontinuous change on the other hand, is called transformational change where things are done differently instead of doing things better.

SMS implementation in a non-SMS environment will be for most, a transformational change. The magnitude and type of change that is required will depend on the degree to which the existing system is already aligned with specific SMS requirements.

Aviation safety relies on maintainers doing each maintenance task to the highest standard capable and systems should provide an environment to allow that to happen.

Also a challenge for CASA's Implementation Team

AGM plus CASA Seminar

The AGM this year will be held in Brisbane on 18 June 2011 at the Grand Chancellor Hotel.

The AGM will be kept short so we can include CASA in this meeting. Prior to the meeting, a copy of the amended Constitution to comply with changes to NSW legislation will be circulated and election of management team iaw the new Constitution will be confirmed.

We have asked CASA to attend to openly discuss the new rules, their application strategy and what assistance they intend to provide to the industry.

We therefore ask that you not only attend but also invite other organisations to attend. Registration can be made by emailing amroba@amroba.org.au of attendees numbers — morning/afternoon tea and lunch will be provided by AMROBA.

We are priming CASA so they not only address the new rules but other issues affecting our members.

Venue contact details:

HOTEL GRAND CHANCELLOR ·
23 Leichardt St. ·
BRISBANE · QLD · 4000
T 07 3834 4856 ·
F 07 3831 5031
Room Rate Starts at \$140.00/night

We intend to run a similar meeting in Albury, with CASA once again in attendance, on a date to be finalised between August & October.

We have selected Saturdays because we realise that most of you cannot get away during the week. We also realise that many of you need to also work on weekends to keep your business viable.

By June, CASA should have developed a lot more information to assist everyone to come to term with these confusing rules.

Please remember to notify attendance and numbers for catering purposes.

CASR Part 91—Consultative draft

CASA has promulgated Part 91 for consultation purposes and it has raised a few eyebrows. The growth in regulations continue the over-regulation of aviation. Senator Michael Ronaldson stated:

“Unchecked, government - driven regulatory environments are an ever expanding perpetual-motion machine. Any bureaucracy is quickly captured by special-interest groups such as the beneficiaries of the regulation, the minister and their staff who wish to keep that portfolio and make it powerful; the departmental employees who administer the regulation and want to make it “better” and non-beneficiaries who want to be included. Even an unused legislative instrument adds to the compliance costs for business – as it must be considered and discounted from their “regulatory compliance programme.”

The General Operating rules are an outcome of what Senator Ronaldson highlighted. It now takes over 300 A4 pages to prescribe Part 91 and its appendices, drafted in the new style for aviation regulations. Like the maintenance regulations, it will take considerable time for these changes to be understood by participants.

There is one benefit for non airline pilots and that is CASA will continue to provide a VFR Guide that is really a “Handbook” for the non commercial pilot to follow. This is similar to the Motor Vehicle Handbooks that learner drivers use rather than learn complicated regulations that many will not comprehend.

The CASA VFR Guide is an aid to help VFR pilots to fly safely in Australia. By using this guide, the VFR pilot will be in compliance with the requirements as well as operating safely. At least, this is what CASA tells us so lets hope it meets these new regulations.

Part 91 consists of 209 regulations but have another 30 odd regulations reserved for RNP operations.

How will a new pilot comprehend their responsibilities under these regulations. Most of the regulations are basically offence provisions if you do not comply information promulgated in the regulations or elsewhere.

Credit must be given to CASA for the Appendix attached to Part 91—“Consolidation List of CASR Part 91 Regulations, Equivalent current Regulations and Orders, and Summaries of the Differences between them.”

In addition, all pilots will need to see that amendments proposed for CASR Part 202 and Dictionary are an attempt to clear up some of the issues that have been raised over the years.

What Part 91 will do is continue a transformational change of the aviation industry that will provide an unknown future benefit to the community.

Under the new maintenance rules, CASA estimates the benefits to be \$308M. This is off-set by operator costs over 15 years estimated to be \$153M. Under the worst case scenario the estimated net benefit is \$56M. It is unsure who benefits.

However, like Part 91’s original aims, new regulations were meant to harmonise with major trading nations so that our industry could:

- Maintain Australia’s international competitiveness in the aviation industry;
- remove inconsistency with international regulations that can pose a safety risk and reduce competition; and
- reduce regulatory requirements where they are no longer justified.

The success of Part 91 will be in seeing if this CASA led transformation of aviation in all sectors will provide the incentives for growth.

Unless the under-utilisation of private aircraft is reversed then these new regulations will fail.

Safety Program—Safety Management Systems

In establishing a States’ requirements for the management of safety, ICAO differentiates between safety programmes and safety management systems (SMS) as follows:

- A **safety program** is an integrated set of regulations and activities aimed at improving safety.
- A **safety management system (SMS)** is an organized approach to managing safety, including the necessary organizational structures, accountabilities, policies and procedures.

The safety programme may include provisions for such diverse activities as incident reporting, safety investigations, safety audits and safety promotion. To implement such safety activities in an integrated manner requires a coherent SMS.

Historically, aviation safety focused on compliance, with increasingly complex regulatory requirements. This approach worked well up until the late 1970s when the accident rate levelled off. Accidents continued to occur in spite of all the rules and regulations.

Modern safety management practices are shifting from a purely reactive to a more **proactive** mode.

Only time will tell if the new regulations enable implementation of modern safety management practices to adopt proactive processes or will they continue enforcing a reactive approach to safety management due to the enforcement approach?

The new regulations ‘enforce’ continuation of reactive mode although they suggest modern practices.

GA Revitalisation Update

No one should misunderstand how hard it will be to change the minds of politicians & bureaucrats that imposed regulatory imposts that are slowly wiping out growth of private general aviation.

There has been so many reviews by various committees but none have identified the real cause why private general aviation is declining. Over-regulation.

The answer is simple, how many flight instructors are now located at regional aerodromes?

If you want to learn to drive a car, another licensed driver can teach you how to drive.

Most States have a questionnaire based on a Handbook, not regulations, and then a testing officer will do a practical test.

Ever since CASA empowered the industry to do the testing aspects, it also decided that training schools had to have an AOC to provide flight training. Since then, there has been a continual decline in people wanting to learn to fly.

There are probably more RAAus training facilities available at aerodromes than CASA approved training schools. The growth in non VH aircraft is totally understood.

The loss of flight instructors at most regional aerodromes is the single reason why people are not opting to become pilots. If a young person in regional Australia wants to learn to fly after school or work, then it is virtually impossible.

If you want to obtain a boat licence in most States you can do so through many boat shed operators situated throughout the State.

The problem for aviation is the lack of qualified flight instructors at aerodromes throughout Australia.

The GA Re-vitalisation Plan is on our website. This is the outcome of the 2011 GA meeting held in Sydney. AOPA, as the sector association where the basic problem resides has, with AMROBA's and other associations support, taken prime responsibility to convince CASA while all GA participants should be lobbying politicians of all levels for a adoption of the FAA flight training regulatory system.

Until the face of GA aviation, the

independent flight instructors, are once again available throughout regional Australia, then GA growth will be restricted.

Airport security is another negative to private air transport even though licence holders have security checks, etc.

The problem for aviation is the lack of political support that we currently have in Parliament.

Having lived through the many machinations of CASA and its predecessors, industry is now aware that the days when its predecessor was concerned with the viability of the industry has long past.

To get private aviation growing again will require political and industry support for abandonment of the regulatory policies over the last couple of decades.

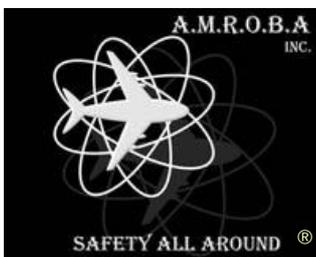
The gap between regulatory imposts on aircraft operating under RAAus and a VH aircraft in private operations is enormous.

If the government and CASA were serious then they would regulate GA to comply with the ICAO Annexes in a similar manner as the FAA and NZ has adopted.

This will take a major cultural change in thinking in CASA and the government—that is why we need all involved to lobby hard.



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The Aircraft Maintenance Engineers/Technician Creed

Worth Remembering

"UPON MY HONOR I swear that I shall hold in sacred trust the rights and privileges conferred upon me as a qualified aircraft maintenance engineer/technician. Knowing full well that the safety and lives of others are dependent upon my skill and judgment, I shall never knowingly subject others to risks which I would not be willing to assume for myself, or for those dear to me.

IN DISCHARGING this trust, I pledge myself never to undertake work or approve work which I feel to be beyond the limits of my knowledge nor shall I allow any non qualified superior to persuade me to approve aircraft or equipment as airworthy against my better judgment, nor shall I permit my judgment to be influenced by money or other personal gain, nor shall I pass as airworthy aircraft or equipment about which I am in doubt either as a result of direct inspection or uncertainty regarding the ability of others who have worked on it to accomplish their work satisfactorily.

I REALIZE the grave responsibility which is mine as a qualified aircraft maintenance engineer/technician, to exercise my judgment on the airworthiness of aircraft and equipment. I, therefore, pledge unyielding adherence to these precepts for the advancement of aviation and for the dignity of my vocation."